

JUN 17 2019

CLERK OF THE COURT

BY: [Signature] Deputy Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

**DEAN R. GRAFILO, DIRECTOR OF THE
DEPARTMENT OF CONSUMER
AFFAIRS, STATE OF CALIFORNIA,**

Plaintiff,

v.

**KAISER FOUNDATION
HOSPITALS/THE PERMANENTE
MEDICAL GROUP,**

Respondent,

**KIMBERLY KIRCHMEYER,
EXECUTIVE DIRECTOR, MEDICAL
BOARD OF CALIFORNIA,**

Real Party in Interest.

Case No. CPF-19-516699

**[PROPOSED] ORDER ON
STIPULATION OF PARTIES TO
ENTRY OF ORDER COMPELLING
COMPLIANCE WITH
INVESTIGATIONAL SUBPOENA**

Date: June 17, 2019

Time: 11:00 a.m.

Dept: 302

Judge: Hon. Ethan P. Schulman

Trial Date: Unassigned

Action Filed: June 12, 2019

1 The court having duly considered the stipulation between the Petitioner and Respondent in
2 this matter, and good cause appearing therefor,

3 IT IS ORDERED that Respondent TPMG shall disclose the names of the patients known to
4 have received vaccine exemptions from Dr. Michael Fielding Allen, as well as the names and
5 addresses of the patients' parents, no later than seventeen (17) days following the date of this
6 Order.

7 IT IS FURTHER ORDERED that the Real Party in Interest, Medical Board of California,
8 notify TPMG and the patients and their parents by service of a Notice to Consumer of its intent to
9 seek copies of vaccine exemptions from Dr. Michael Fielding Allen and their medical records by
10 release of medical information or by subpoena no later than ten (10) days following Respondent's
11 disclosure.

12 If the Board receives releases for the vaccine exemptions from Dr. Michael Fielding Allen
13 and medical records, or the parents do not object to a subpoena for the medical records within the
14 statutory period, Respondent shall provide copies of the vaccine exemptions from Dr. Michael
15 Fielding Allen and medical records to the Board within fifteen (15) days. Otherwise, the matter
16 will be subject to such other and further proceedings as Petitioner and Real Party in Interest may
17 initiate.

18 Dated: June 17, 2015

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22 ETHAN P. SCHULMAN
23 Judge of the Superior Court
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